

Corder

HUKILL CHEMICAL CORPORATION

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Over Thirty-Five Years of Quality Products and Services

US EPA RECORDS CENTER REGION 5



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January 21, 1985

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OHIO EPA

JAN 24 1985

Mr. Ron Lillich
U.S. EPA Region V
Waste Management Division
230 South Dearborn Street
Chicago, Illinois 60604

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DIV. of SOLID & HAZ. WASTE MGT.

JAN 30 1985

OHIO EPA-N.E.D.O.

Dear Ron:

I wish to confirm our conversation of Tuesday, January 8, 1985. You stated that Hukill Chemical Corporation would be in compliance with the Compliance Order in regards to the January 15th deadline on Technical Response. This was based on the information submitted on December 31, 1984, and with the understanding that issues relating to Chem Fuel are on hold right now, and that an extension of time was needed to provide the proper information to put the East and West Feed tanks in our Part B as hazardous waste storage tanks.

You requested a statement regarding the status of the feed tanks and a schedule of events for their completion. The delay on the Feed Tanks was due to our strong feeling that these tanks did not belong in the same class as the HW storage tanks. We felt an average of 24 hours residence time was adequate, but as a maximum, it was too restrictive. We tried to come up with another set of criteria for feed tanks. All of our options entailed more complex and detailed record keeping and managing. We gave up the effort but had used up the 60 day time allowance. Therefore, we requested a 45 day extension to provide the required information.

During this period, we will manage the tanks under the 24 hour approach and they will stand empty over the weekend. We would request that in the case of a machine break down during the week, that we be allowed an additional 24 hours of residence in the tank. This would not apply over the weekends.

The following is the schedule for putting the two tanks on the permit as HW tanks:

1. Prints completed January 25, 1985
2. Ultra Sound completed February 1, 1985
3. Engineer's report completed February 12, 1985
4. Submit to EPA February 15, 1985

As you see, we were not able to improve on the 45 day schedule.
I trust that I have addressed your concerns, but if you have any questions,
please give me a call.

Very truly yours,

HUKILL CHEMICAL CORPORATION



Robert L. Hukill
Vice President
General Manager

RLH/sj

cc: Richard Shank
Office of Hazardous Materials Management
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